



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

LAURA C. WILLIAMS
Labor & Employment Law Division
Phone: (212) 356-2435
Fax: (212) 356-2439
lawillia@law.nyc.gov

January 12, 2021

BY ECF

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

So ordered,
/s/
Alvin K. Hellerstein
1/13/21

Re: Colette Smith v. MetroPlus Health Plan, et al.
Civil Action No.: 20-cv-10570 (AKH)

Dear Judge Hellerstein:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants MetroPlus Health Plan and New York City Health and Hospitals Corporation (collectively, "Defendants") in the above-referenced action. I write to respectfully request a 45-day extension of time, from January 14, 2021 to March 1, 2021, for Defendants to respond to the complaint. This is Defendants' first request for an extension of time and Plaintiff's counsel has consented to this request. There are no other dates previously scheduled after the original date.

This extension is requested to provide this office with sufficient time to thoroughly investigate the allegations contained in the complaint and to formulate an appropriate response. In addition, this office must identify, locate, and review any documents relevant to Plaintiff's claims. Furthermore, the additional time will allow me to determine whether proper service has been effectuated upon individually-named defendant, Teresa Taylor, and if so, to then determine pursuant to § 50-k of the New York General Municipal Law, whether we may represent her. Accordingly, to permit the foregoing, and without appearing at this time on behalf of individually-named defendant, Teresa Taylor, this office also asks that the Court extend the deadline correspondingly, to March 1, 2021, for her respective response to the complaint. Plaintiff's counsel consents to this request.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel

cc: Corey Stark, Esq. (by ECF)
Corey Stark PLLC
Attorney for Plaintiff